



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMK
F.#2009R00579

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March 1, 2012

By E-Mail

Howard Jacobs, Esq.
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Re: United States v. John Burke
Criminal Docket No. 09-135 (S-7) (SJ)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides notice that it intends to call the experts whose anticipated testimony at trial is described below. The government reserves the right to call substitute expert witnesses as well as to call additional expert witnesses, and will provide advance notice of any intent to do so. The government also renews its request for reciprocal discovery from the defendant, including notice of any anticipated defense experts.

I. Medical Examiner Testimony

The government intends to call the following medical examiners to testify during trial.

A. Dr. Josette Montas

The government will seek to qualify Josette Montas, M.D. as an expert in forensic pathology. Dr. Montas received her medical degree in Haiti in 1966. Dr. Montas was a medical examiner at the Office of the Chief Medical Examiner, City of New York ("New York City OCME") from approximately 1973 to 1999. Dr. Montas is licensed to practice medicine in the state of New York. Dr. Montas has testified as an expert in New York State Courts and has performed over 2,000 autopsies. Dr. Montas will testify about the autopsy she performed on Daniel Zahn on or about August 29, 1982. Dr. Montas is expected to testify about the Zahn autopsy consistent with the report and supporting materials previously produced in discovery and contained in 18 U.S.C. § 3500 material.

B. Dr. Tamara Bloom

The government will seek to qualify Tamara Bloom, M.D. as an expert in forensic pathology. Enclosed is a copy of Dr. Bloom's curriculum vitae. Dr. Bloom has been a medical examiner at the Office of the Nassau County Chief Medical Examiner since 1992. Dr. Bloom is licensed to practice medicine in New York. Dr. Bloom has worked in the field of forensic pathology for over 25 years and has testified as an expert in New York State Courts as well as in the Eastern District of New York.

Dr. Bloom will testify about the autopsy she performed on Bruce Gotterup on or about November 20, 1991. Dr. Bloom is expected to testify about the Gotterup autopsy consistent with the report and supporting materials previously produced in discovery and contained in 18 U.S.C. § 3500 material.

C. Dr. Kari Reiber

The government will seek to qualify Kari Reiber, M.D. as an expert in forensic pathology. Enclosed is a copy of Dr. Reiber's curriculum vitae. Dr. Reiber has been Dutchess County Medical Examiner since 2003. Dr. Reiber is licensed to practice medicine in New York State, Washington State and Washington, D.C. Dr. Reiber has worked in the field of pathology for approximately 25 years and has testified as an expert on numerous occasions in state and federal courts.

Dr. Reiber will testify about the autopsy she performed on John Gebert on or about July 13, 1996. Dr. Reiber is expected to testify about the Gebert autopsy consistent with the report and supporting materials previously produced in discovery and contained in 18 U.S.C. § 3500 material.

II. Ballistics Testimony

The government will seek to qualify Joseph Amato as an expert in the field of ballistics. Enclosed is a copy of Mr. Amato's curriculum vitae. Mr. Amato worked in the Firearms Section of the New York City Police Department Laboratory from 1989 until 2000. Mr. Amato has testified as an expert on more than 400 occasions in state and federal courts in New York and Connecticut. Mr. Amato is expected to testify about the forensic examination he performed on ballistics evidence related to the

murder of John Gebert consistent with documents previously produced in discovery and contained in 18 U.S.C. § 3500 material.

If you have questions or requests regarding the contents of this letter, please contact us.

Sincerely,

LORETTA E. LYNCH
United States Attorney

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Enclosures

cc: Defense Counsel (by ECF) (w/o enclosures)
Clerk of the Court (SJ) (by ECF) (w/o enclosures)